

1 JOHN J. SHAEFFER (SBN 138331)
jshaeffer@FoxRothschild.com
2 FOX ROTHSCHILD LLP
Constellation Place
3 10250 Constellation Blvd, Suite 900
Los Angeles, CA 90067
4 Telephone: 310.598.4150
Facsimile: 310.556.9828
5

MICHAEL K. TWERSKY (*pro hac vice*)
6 mtwersky@foxrothschild.com
BETH L. WEISSER (*pro hac vice*)
7 bweisser@foxrothschild.com
ERIKA PAGE (*pro hac vice*)
8 epage@foxrothschild.com
ALBERTO M. LONGO (*pro hac vice*)
9 alongo@foxrothschild.com
FOX ROTHSCHILD, LLP
10 980 Jolly Road, Suite 110
Blue Bell, PA 19422
11 Telephone: 610.397.6500
Facsimile: 610.397.0450
12

Attorneys for Plaintiffs
13 Sunil Kumar, Ph.D. and Praveen Sinha, Ph.D.

14 **IN THE UNITED STATES DISTRICT COURT**
15 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

16 SUNIL KUMAR, Ph. D
PRAVEEN SINHA, Ph. D.,

17 Plaintiffs,

18 v.

19 DR. JOLENE KOESTER, in her official
20 capacity as Chancellor of California State
University,

21 Defendant.

Case No. 2:22-CV-07550-RGK-MAA

**DECLARATION OF ALBERTO M.
LONGO IN SUPPORT OF
PLAINTIFFS' OPENING BRIEF**

Judge: R. Gary Klausner
Trial: October 24, 2023
(on the briefs)

DECLARATION OF ALBERTO M. LONGO

I, Alberto M. Longo, do hereby state and declare as follows:

1. I am an attorney at law duly licensed to practice law in the Commonwealth of Pennsylvania and State of New Jersey. I am an associate at the law firm of Fox Rothschild LLP and am admitted *pro hac vice* in this proceeding. I submit this declaration in support of Plaintiffs' Opening Brief. I have personal knowledge of the matters contained in this declaration and, if called and sworn as a witness, I could and would competently testify to all the matters contained herein.

2. Attached hereto as **Exhibit A** is a true and correct copy of the California State University ("CSU") Policy Prohibiting Discrimination, Harassment, Sexual Exploitation, Dating Violence, Domestic Violence, Stalking, and Retaliation (the "Policy"), which was produced by Defendant in this case bearing Bates label CSU000582-000671.

3. Attached hereto as **Exhibit B** is a true and correct copy of selected pages from the deposition of Laura Anson ("Anson Tr."), Defendant's designee, conducted on August 4, 2023 for use in this action.

4. Attached hereto as **Exhibit C** is a true and correct copy of the California Faculty Association's ("CFA") Resolution in Support of Adding Caste as a Protected Category ("CFA Resolution"), which is publicly available for viewing and downloading on the California Faculty Association Website.¹ See https://www.calfac.org/wp-content/uploads/2021/10/caste_resolution_sponsorbyAPIDA_revision10.10.21.pdf.

5. Attached hereto as **Exhibit D** is a true and correct copy of the California State Student Association's ("CSSA") Resolution Calling for CSU to Include Caste in Anti-Discrimination Policy ("CSSA Resolution"), which was produced by Defendant in this case bearing Bates label CSU001296-001299.

¹ The CFA Resolution is also attached as Exhibit D to Plaintiffs' Complaint (Dkt. No. 1-1).

